

# EXHIBIT A



DISTRICT COURT, CITY AND COUNTY OF DENVER  
STATE OF COLORADO  
1437 Bannock Street  
Denver, Colorado 80202

^ COURT USE ONLY ^

ERIC COOMER, Ph.D., Case Number 2020CV034319  
Plaintiff,

Courtroom 409

vs.

DONALD J. TRUMP FOR PRESIDENT, INC.,  
SIDNEY POWELL, SIDNEY POWELL, P.C.,  
RUDOLPH GIULIANI, JOSEPH OLTMANN,  
FEC UNITED, SHUFFLING MADNESS MEDIA, INC.,  
dba CONSERVATIVE DAILY, JAMES HOFT,  
TGP COMMUNICATIONS LLC, dba THE GATEWAY PUNDIT,  
MICHELLE MALKIN, ERIC METAXAS, CHANEL RION,  
HERRING NETWORKS, INC. dba ONE AMERICA  
NEWS NETWORK, and NEWSMAX MEDIA, INC.,  
Defendants.

VIDEO-RECORDED REMOTE 30(b)(6) DEPOSITION OF  
DONALD J. TRUMP FOR PRESIDENT, INC.,  
BY SEAN RAY DOLLMAN

REMOTE APPEARANCES:

ON BEHALF OF THE PLAINTIFF:

ZACH BOWMAN, ESQ.  
CHARLES J. CAIN, ESQ.  
STEVE SKARNULIS, ESQ.  
BRAD KLOEWER, ESQ.  
Cain & Skarnulis PLLC  
P.O. Box 1064  
Salida, Colorado 81201  
Telephone: 719-530-3011  
Email: zbowman@cstrial.com  
ccain@cstrial.com  
skarnulis@cstrial.com  
bkloewer@cstrial.com

<p>1 REMOTE APPEARANCES (CONTINUED):</p> <p>2 THOMAS M. ROGERS III (TREY), ESQ.</p> <p>3 RechtKornfeld, PC</p> <p>4 1600 Stout Street, Suite 1400</p> <p>5 Denver, Colorado 80202</p> <p>6 Telephone: 303-573-1900</p> <p>7 Email: trey@rklawpc.com</p> <p>8</p> <p>9 ON BEHALF OF THE DEFENDANT DONALD J. TRUMP FOR</p> <p>10 PRESIDENT, INC.:</p> <p>11 JOHN ZAKHEM, ESQ.</p> <p>12 Jackson Kelly, PLLC</p> <p>13 1099 Eighteenth Street, Suite 2150</p> <p>14 Denver, Colorado 80202</p> <p>15 Telephone: 303-390-0016</p> <p>16 Email: jszakhem@jacksonkelly.com</p> <p>17 ON BEHALF OF THE DEFENDANT SIDNEY POWELL and SIDNEY</p> <p>18 POWELL, P.C.:</p> <p>19 BARRY ARRINGTON, ESQ.</p> <p>20 Arrington Law Firm</p> <p>21 3801 East Florida Avenue, Suite 830</p> <p>22 Denver, Colorado 80210</p> <p>23 Telephone: 303-205-7870</p> <p>24 Email: barry@arringtonpc.com</p> <p>25</p> <p>ON BEHALF OF THE DEFENDANTS JOSEPH OLTMANN, FEC</p> <p>UNITED, and SHUFFLING MADNESS MEDIA, INC. dba</p> <p>CONSERVATIVE DAILY:</p> <p>ANDREA M. HALL, ESQ.</p> <p>The Hall Law Office, LLC</p> <p>P.O. Box 2251</p> <p>Loveland, Colorado 80539</p> <p>Telephone: 970-419-8234</p> <p>Email: andrea@thehalllawoffice.com</p> <p>ON BEHALF OF THE DEFENDANT MICHELLE MALKIN:</p> <p>GORDON A. QUEENAN, ESQ.</p> <p>Patterson Ripplinger, P.C.</p> <p>5613 DTC Parkway, Suite 400</p> <p>Greenwood Village, Colorado 80111</p> <p>Telephone: 303-741-4539</p> <p>Email: gqueenan@prpclegal.com</p>	<p>1 PURSUANT TO WRITTEN NOTICE and the</p> <p>2 appropriate rules of civil procedure, the video-recorded</p> <p>3 remote 30(b)(6) deposition of Donald J. Trump for</p> <p>4 President, Inc., by SEAN RAY DOLLMAN called for examination</p> <p>5 be the Plaintiff, was taken with all parties appearing remotely,</p> <p>6 commencing at 3:19 p.m., on August 9, 2021, before</p> <p>7 Kimberly Smith, Registered Professional Reporter and</p> <p>8 Notary Public in and for the State of Colorado.</p> <p>9</p> <p>10 I N D E X</p> <p>11</p> <p>12 EXAMINATION: PAGE</p> <p>13 By Mr. Bowman 8</p> <p>14 EXHIBITS: PAGE</p> <p>15 Exhibit 62 Transcript: 'Fox News Sunday' 18</p> <p>Interview with President Trump</p> <p>16 Exhibit 63 Election Night Video 22</p> <p>17 Exhibit 64 Tweet from President Trump 28</p> <p>18 Exhibit 65 Giuliani Four Seasons Landscaping 29</p> <p>Press Conference</p> <p>19 Exhibit 66 President Trump Twitter 38</p> <p>20 Exhibit 68 Email to Parkinson and Others from 39</p> <p>Cleary, Subject: RE: Project,</p> <p>21 11/14/2020, with attached emails,</p> <p>22 with attachment</p> <p>23</p> <p>24</p> <p>25</p>
<p>1 REMOTE APPEARANCES (CONTINUED):</p> <p>2 ON BEHALF OF THE DEFENDANT ERIC METAXAS:</p> <p>3 MARGARET BOEHMER, ESQ.</p> <p>4 Gordon Rees Scully Mansukhani, LLP</p> <p>5 555 Seventeenth Street, Suite 3400</p> <p>6 Denver, Colorado 80202</p> <p>7 Telephone: 303-534-5160</p> <p>8 Email: mboehmer@grsm.com</p> <p>9 ON BEHALF OF THE DEFENDANTS CHANEL RION and HERRING</p> <p>10 NETWORKS, INC. dba ONE AMERICA NEWS NETWORK:</p> <p>11 STEPHEN K. DEXTER, ESQ.</p> <p>12 BRAD JOHNSON, ESQ.</p> <p>13 Lathrop GPM LLP</p> <p>14 1515 Wynkoop Street, Suite 600</p> <p>15 Denver, Colorado 80202</p> <p>16 Telephone: 720-931-3200</p> <p>17 Email: stephen.dexter@lathropgpm.com</p> <p>18 brad.johnson@lathropgpm.com</p> <p>19 ON BEHALF OF THE DEFENDANT DEFENDING THE REPUBLIC:</p> <p>20 MICHAEL W. REAGOR, ESQ.</p> <p>21 Dymond Reagor, PLLC</p> <p>22 8400 East Prentice Avenue, Suite 1040</p> <p>23 Greenwood Village, Colorado 80111</p> <p>24 Telephone: 303-793-3400</p> <p>25 Email: mreagor@drc-law.com</p> <p>Also Present: Peter Zierlein, Videographer</p> <p>Ingrid DeFranco</p> <p>Abbie Frye</p> <p>Alex Cannon</p> <p>Eric Coomer, Ph.D.</p>	<p>1 Exhibit 74 Plaintiff's Notice of Intention 16</p> <p>2 to Take Oral and Videotaped</p> <p>3 Deposition of the Authorized</p> <p>4 Representative(s) of Defendant</p> <p>5 Donald J. Trump For President, Inc.</p> <p>6 PREVIOUSLY MARKED EXHIBITS:</p> <p>7 Exhibit 3 Press Conference, 11/19 58</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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2 (Pages 2 - 5)

<p>1 PROCEEDINGS</p> <p>2 THE VIDEOGRAPHER: Here begins the</p> <p>3 deposition of Sean Dollman, as the corporate</p> <p>4 representative for Donald J. Trump For President, Inc.</p> <p>5 Today's date is August 9, 2021; and the time is</p> <p>6 3:19 p.m. Mountain Time.</p> <p>7 Will counsel please identify themselves for</p> <p>8 the record, after which the court reporter will swear</p> <p>9 in the witness.</p> <p>10 MR. BOWMAN: Zach Bowman here for Plaintiff</p> <p>11 Dr. Eric Coomer.</p> <p>12 MR. ZAKHEM: John Zakhem on behalf of the</p> <p>13 Defendant Donald J. Trump For President, Inc.</p> <p>14 THE REPORTER: Is that it?</p> <p>15 (No response.)</p> <p>16 THE REPORTER: Okay. I will have a brief</p> <p>17 statement, just allowing me to swear in Mr. Dollman</p> <p>18 remotely; and then I will swear him in.</p> <p>19 All counsel participating in this</p> <p>20 deposition acknowledge that I am not physically</p> <p>21 present with counsel nor the deponent and that I will</p> <p>22 be reporting this deposition and swearing in the</p> <p>23 deponent remotely.</p> <p>24 In lieu of an oath administered in person,</p> <p>25 the witness declares that his testimony in this matter</p> <p style="text-align: right;">Page 6</p>	<p>1 necessary, on Friday, after the Metaxas deposition, if</p> <p>2 we need additional time within that three-hour time</p> <p>3 span.</p> <p>4 So I thought -- let's see if -- is that</p> <p>5 working for all counsel?</p> <p>6 MR. ZAKHEM: I'm going to have to talk with</p> <p>7 my client about that, Zach. That was you and me</p> <p>8 texting. But if it works for my client, that will</p> <p>9 work for me.</p> <p>10 MR. BOWMAN: Okay. Well, maybe during the</p> <p>11 break, let's do that and get that on the record before</p> <p>12 we end today.</p> <p>13 MR. ZAKHEM: Sure. The one other thing</p> <p>14 that we've done as a matter of courtesy and efficacy</p> <p>15 on all these prior depositions is that any objection</p> <p>16 spoken by any counsel is joined by any of the other</p> <p>17 counsel not responding.</p> <p>18 MR. BOWMAN: That's fine.</p> <p>19 SEAN RAY DOLLMAN</p> <p>20 having been first duly sworn, was examined and</p> <p>21 testified as follows:</p> <p>22 EXAMINATION</p> <p>23 BY MR. BOWMAN:</p> <p>24 Q Good afternoon, almost evening, Mr.</p> <p>25 Dollman. How are you today?</p> <p style="text-align: right;">Page 8</p>
<p>1 is being given under penalty of perjury. The parties</p> <p>2 and their counsel consent to this arrangement and</p> <p>3 waive any objections to this manner of reporting and</p> <p>4 manner of providing an oath.</p> <p>5 Counsel, please indicate your agreement by</p> <p>6 stating your name and your agreement on the record;</p> <p>7 and then I will swear in the witness.</p> <p>8 MR. BOWMAN: Zach Bowman for Plaintiff.</p> <p>9 Agrees.</p> <p>10 MR. ZAKHEM: This is John Zakhem. We've</p> <p>11 had a practice in previous -- since there's so many of</p> <p>12 us, just saying, Does anyone object? No one ever</p> <p>13 does. And then we can just move forward.</p> <p>14 THE REPORTER: Perfect. Does anyone</p> <p>15 object?</p> <p>16 (No response.)</p> <p>17 THE REPORTER: Thank you.</p> <p>18 MR. BOWMAN: And before we get into the</p> <p>19 actual deposition, let me deal with a housekeeping</p> <p>20 matter. I know the last deposition went long.</p> <p>21 And I've spoken with Mr. Zakhem about the</p> <p>22 possibility of needing to continue this, because I</p> <p>23 understand he has a 5:15 part out on this, Western --</p> <p>24 or Mountain Time.</p> <p>25 So we've discussed continuing this, if</p> <p style="text-align: right;">Page 7</p>	<p>1 A I'm pretty good, sir. Yourself?</p> <p>2 Q Okay. Would you please state your full</p> <p>3 name for the record.</p> <p>4 A My name is Sean Ray Dollman.</p> <p>5 Q Say your middle name again.</p> <p>6 A Ray.</p> <p>7 Q Ray, R-a-y?</p> <p>8 A R-a-y. Yes, sir.</p> <p>9 Q My name is Zach Bowman. I'm an attorney</p> <p>10 for the plaintiff, Dr. Eric Coomer, in this case.</p> <p>11 You understand this case involves claims</p> <p>12 brought by Mr. Coomer against the Trump campaign and</p> <p>13 other defendants for defamation, intentional</p> <p>14 infliction of emotional distress, and conspiracy?</p> <p>15 A Yes.</p> <p>16 Q And you are here as a representative of the</p> <p>17 Trump campaign; is that correct?</p> <p>18 A Yes, sir.</p> <p>19 Q And so when I use the shorthand of "the</p> <p>20 campaign," you understand I'm referring to Donald J.</p> <p>21 Trump For President, Inc., correct?</p> <p>22 A Yes, sir.</p> <p>23 Q And have you ever given your deposition</p> <p>24 before?</p> <p>25 A One other time.</p> <p style="text-align: right;">Page 9</p>

<p>1 communication at the campaign about these kind of</p> <p>2 statements and whether there is a need to go on the</p> <p>3 record and correct them?</p> <p>4 MR. ZAKHEM: I'll object to the extent it</p> <p>5 seeks privileged or work product information.</p> <p>6 If you can answer without disclosing any of</p> <p>7 that, please proceed.</p> <p>8 A Again, Mr. Bowman, I lost track of what</p> <p>9 that question was again.</p> <p>10 Q (By Mr. Bowman) Was there any kind of</p> <p>11 internal discussion about whether there was a need to</p> <p>12 correct statements made by Giuliani at this Four</p> <p>13 Seasons Landscaping press conference?</p> <p>14 A I believe at this point in time, I mean,</p> <p>15 right after an election, we were still investigating</p> <p>16 what happened and trying to get facts together.</p> <p>17 Q I'm going to show you Exhibit 66, where</p> <p>18 Donald Trump tweets that Dominion deleted 2.7 million</p> <p>19 Trump votes nationwide; and he cites as a source there</p> <p>20 Chanel Rion and OAN.</p> <p>21 Was OAN a source that the campaign</p> <p>22 frequently relied on?</p> <p>23 MR. ZAKHEM: Object to form and foundation.</p> <p>24 This isn't a campaign statement.</p> <p>25 Q (By Mr. Bowman) Do you -- is this a</p> <p style="text-align: right;">Page 38</p>	<p>1 substantiate or debunk.</p> <p>2 Who is Zach Parkinson?</p> <p>3 A He was the director of research for comms.</p> <p>4 Q And then were Jacki, Dean Cleary, and Matt</p> <p>5 VanHyfte each part of the research team?</p> <p>6 A Yes, sir.</p> <p>7 Q And so Zach sends a list of topics that he</p> <p>8 wants them to look into regarding Smartmatic and</p> <p>9 Dominion, allegations that they're tied to Venezuela,</p> <p>10 et cetera. And this is at 6 p.m., on November 13th.</p> <p>11 About three hours later, Dean Cleary</p> <p>12 responds saying, We're making great progress. We've</p> <p>13 got an 11-page document right now. It's slow and</p> <p>14 tedious. I don't have an end prediction, but we got</p> <p>15 maybe three-quarters of what you asked on paper.</p> <p>16 So do you recall what the impetus -- or</p> <p>17 what initiated the need for this research?</p> <p>18 A I think at this point in time, it was</p> <p>19 probably trying to track down any leads that we could</p> <p>20 get.</p> <p>21 Q Anything regarding election fraud, right?</p> <p>22 A Sure.</p> <p>23 Q And then Zach Parkinson says, "Let's cut</p> <p>24 this off at 10:30. Have more dead voters we'll need</p> <p>25 to get to in the morning."</p> <p style="text-align: right;">Page 40</p>
<p>1 campaign statement by Donald J. Trump?</p> <p>2 A It looks like a quote from Chanel Rion.</p> <p>3 That's --</p> <p>4 Q Was it the position of the campaign at this</p> <p>5 time, on November 12th, 2020, that Dominion had</p> <p>6 deleted 2.7 million votes?</p> <p>7 A It looks like to me that President Trump is</p> <p>8 just saying what Chanel Rion said. It looks like a</p> <p>9 quote.</p> <p>10 Q So -- okay. Let's move on from this. I'm</p> <p>11 going to get to -- have you reviewed the documents</p> <p>12 produced by the campaign in this litigation?</p> <p>13 A I went through it. I didn't go in depth.</p> <p>14 Q So I'm showing you what's been marked as</p> <p>15 Exhibit 68, which is the batch of documents produced</p> <p>16 by the campaign.</p> <p>17 And I'm going to start at the beginning of</p> <p>18 this email chain. On November 13th, Zach Parkinson</p> <p>19 emails Jacki -- can you say that name for me, or not?</p> <p>20 If you can't --</p> <p>21 A No, sir.</p> <p>22 Q -- Jacki Kotkiewicz, Dean Cleary, and Matt</p> <p>23 VanHyfte, About to send you all a Dominion-related</p> <p>24 project we need to look at, so don't head to the bar.</p> <p>25 I'll send specific things we need to look into and</p> <p style="text-align: right;">Page 39</p>	<p>1 Do you know what that's in reference to?</p> <p>2 A I would think he means -- it looks more</p> <p>3 like a -- I wouldn't say joking around with it, but</p> <p>4 there was a lot of talk about dead voters voting</p> <p>5 within this election. So I would think he was just</p> <p>6 referring to what we've been looking into.</p> <p>7 Q So that's similar to the dead voters</p> <p>8 allegation that Giuliani was making in the press</p> <p>9 conference we just looked at, right?</p> <p>10 MR. ZAKHEM: Object to form. Foundation.</p> <p>11 A I think there was a lot of talk about</p> <p>12 people who passed away that voted in this election. I</p> <p>13 don't know if it ties directly to the same individuals</p> <p>14 that Mr. Giuliani was talking about, but there's a --</p> <p>15 there was a lot of discussion about looking into</p> <p>16 people who passed away that voted in this election.</p> <p>17 Q (By Mr. Bowman) So the campaign was</p> <p>18 looking at multiple theories for trying to show that</p> <p>19 the election was fraudulent?</p> <p>20 MR. ZAKHEM: Object to form and foundation.</p> <p>21 A I would -- I would say there's multiple</p> <p>22 theories, and the campaign was just trying to weed</p> <p>23 out -- and just -- we were looking into what possible</p> <p>24 fraud there was.</p> <p>25 Q (By Mr. Bowman) And you said, "weed out."</p> <p style="text-align: right;">Page 41</p>

Message

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**From:** Dean Cleary [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9A11C8F29A2443DAB67E187FF27C68C0-DCLEARY]  
**Sent:** 11/14/2020 3:38:13 AM  
**To:** Zach Parkinson [zparkinson@donaldtrump.com]; Matt VanHyfte [mvanhyfte@donaldtrump.com]; Jacki Kotkiewicz [jkotkiewicz@donaldtrump.com]  
**Subject:** RE: Project  
**Attachments:** Dominion, Smartmatic, Sequoia And Venezuela.docx

SERVED ONLY: July 23, 2021 5:26 PM  
FILING ID: 6EBDF31F970BA  
CASE NUMBER: 2020CV34319

Attached here.

Not polished but I think we answered all of the questions.

The common theme here is that Dominion and Smartmatic were only in a partnership for three years nearly a decade ago but there has been some common connections with 3<sup>rd</sup> party groups, although not at the same time.

The election technology industry seems to be constantly buying and selling the same smaller firms back and forth and continuously rebranding themselves.

**From:** Zach Parkinson <zparkinson@donaldtrump.com>  
**Sent:** Friday, November 13, 2020 9:53 PM  
**To:** Dean Cleary <dcleary@donaldtrump.com>; Matt VanHyfte <mvanhyfte@donaldtrump.com>; Jacki Kotkiewicz <jkotkiewicz@donaldtrump.com>  
**Subject:** RE: Project

Let's cut this off at 10:30. Have more dead voters we'll need to get to in the morning.

**From:** Dean Cleary <dcleary@donaldtrump.com>  
**Sent:** Friday, November 13, 2020 9:38 PM  
**To:** Zach Parkinson <zparkinson@donaldtrump.com>; Matt VanHyfte <mvanhyfte@donaldtrump.com>; Jacki Kotkiewicz <jkotkiewicz@donaldtrump.com>  
**Subject:** RE: Project

We are making great progress, we got an 11 page doc right now. It is very slow and tedious learning and tracing down the claims and leads. I don't have an end prediction but we got maybe three-quarters of what you asked on paper.

**From:** Zach Parkinson <zparkinson@donaldtrump.com>  
**Sent:** Friday, November 13, 2020 9:36 PM  
**To:** Matt VanHyfte <mvanhyfte@donaldtrump.com>; Jacki Kotkiewicz <jkotkiewicz@donaldtrump.com>; Dean Cleary <dcleary@donaldtrump.com>  
**Subject:** RE: Project

How are we looking?

**From:** Zach Parkinson  
**Sent:** Friday, November 13, 2020 6:06 PM  
**To:** Matt VanHyfte <mvanhyfte@donaldtrump.com>; Jacki Kotkiewicz <jkotkiewicz@donaldtrump.com>; Dean Cleary <dcleary@donaldtrump.com>  
**Subject:** RE: Project

**Exhibit  
PX 0068**

We need to look at these questions. Obviously, this is some conspiratorial stuff, but we need to be thorough and track it down. The two attached jpgs have the background on this "theory".

Want the same format and type of product as last night. Attached is the final version of that for reference.

- Smartmatic
  - What is the relationship between Smartmatic and Dominion?
  - Do Dominion machines or software use software from Smartmatic?
  - Smartmatic is supposedly Spanish-owned. If so, are the votes somehow sent "overseas" to Spain when they are counted or tabulated?
  - Is Dominion somehow owned by Smartmatic through a company named Indra?
  - What is Smartmatic's relationship to Venezuela and the Venezuelan government?
- Poulos
  - Is there some type of evidence that Poulos has "contributed" to antifa?

**From:** Matt VanHyfte <mvanhyfte@donaldtrump.com>

**Sent:** Friday, November 13, 2020 5:15 PM

**To:** Zach Parkinson <zparkinson@donaldtrump.com>; Jacki Kotkiewicz <jkotkiewicz@donaldtrump.com>; Dean Cleary <dcleary@donaldtrump.com>

**Subject:** Re: Project

Just a heads up for all, I'm picking up my dog currently. But should not take long. I'll hop on ASAP.

---

**From:** Zach Parkinson <zparkinson@donaldtrump.com>

**Sent:** Friday, November 13, 2020 5:13:43 PM

**To:** Jacki Kotkiewicz <jkotkiewicz@donaldtrump.com>; Dean Cleary <dcleary@donaldtrump.com>; Matt VanHyfte <mvanhyfte@donaldtrump.com>

**Subject:** Project

About to send y'all a Dominion-related project we need to look at, so don't head to the bar. I'll send specific things we need to look into and substantiate or debunk.



# **Dominion, Smartmatic, Sequoia And Venezuela**

## **TOPLINES**

### **Dominion And Smartmatic Are Independent Companies That Split From Each Other In 2012,**

- Both Dominion and Smartmatic are companies that provide election systems consulting
- Dominion entered into a partnership with Smartmatic in 2009
  - Dominion provided Smartmatic with voter machines used in the 2010 and 2013 Philippine elections
  - There were highly publicized glitches in the machines that caused reputational harm on Dominion.
- Dominion and Smartmatic terminated their partnership in 2012 after Smartmatic began doing business in Puerto Rico which Dominion interpreted as a violation of a noncompetition agreement in the United States
  - There is no evidence Dominion used Smartmatic technology in their machines in the 2020 election

### **There Is No Apparent Relationship Between Smartmatic And The Spanish Company Indra,**

- Smartmatic claims that it has no relationship with Indra
- Smartmatic and Indra are rivals in the Philippines
- There is no evidence that votes were being counted overseas in Spain
  - The co-founder and CEO of Smartmatic is a Spanish-Venezuelan Citizen who now lives in London.
  - Smartmatic is headquartered in London

### **Dominion Has Not Direct Ties To Venezuela,**

- While Dominion has no company ties to Venezuela, Smartmatic does through its owners
- Smartmatic was investigated by the Committee on Foreign Investment in the United States due to its ties to Venezuela
- In 2004, Smartmatic was chosen by Venezuelan authorities to be used in a contentious referendum that confirmed Chavez as President
  - This election is believed to have been tampered with, as the algorithm appeared to adjust the vote in Chavez favor
- Before this election, the Venezuelan government invested in a smaller company tied to Smartmatic through its owners
  - In return for the investment, the Venezuelan government agency was given a 28 percent stake and a seat on its board
  - The Venezuelan government placed a senior official of the Science Ministry and advisor to Chavez on elections technology, Omar Montilla, on the board

[ PAGE \\* MERGEFORMAT ]

- Venezuelan officials insist the money invested was repaid, and that Venezuela never directly had a stake in Smartmatic

### **Sequoia Was Owned By Smartmatic From 2005 to 2007 And Not Purchased By Dominion Until 2010**

- Smartmatic owned Sequoia voting machines from 2005 to 2007
- While Smartmatic owned Sequoia, Sequoia machines caused irregularities in Chicago
- Dominion bought Sequoia in 2010, three years after Smartmatic sold the company

### **There Is No Evidence That Dominion's CEO Or Any Other Leader Of The Group Has Ties To Antifa**

- There is no evidence that Dominion CEO John Poulos has tied to Antifa
- There is an internet rumor that Dominion's Director Of Product Safety, Dr. Eric Coomer, had ties to Antifa
  - Coomer allegedly posted (now deleted) some songs to his Facebook Page that were anti-police.
  - Coomer also wrote a facebook post (now deleted) in which he criticized President Trump for characterizing Antifa as an organization.
  - There is no evidence Coomer is a member or has any ties to Antifa

## **COMPANY PROFILE**

### ***Smartmatic Has A Global Presence***

**Smartmatic Was Established In Florida In The Wake Of The 2000 Election.** "Established in Florida in the wake of the 2000 election, Smartmatic focused on building the most secure, accessible and easy-to-use election technologies ever designed, to safeguard the election process from start to finish." ("About Smartmatic," [ HYPERLINK "<https://www.smartmatic.com/us/about/leadership/>" ], Accessed 11/13/20)

- **In 2005, Smartmatic First Launched Its Technology In The United States.** ("Our History," [ HYPERLINK "<https://www.smartmatic.com/us/about/our-history/>" ], Accessed 11/13/20)

**Smartmatic Has Designed And Implemented Secure Voting Technologies For Election Commissions On 5 Continents In 25 Countries.** "Today, Smartmatic is the world leader in election technology. From Chicago to Manila. From Utah to Belgium. And from Los Angeles to London – since 2003 Smartmatic has successfully designed and implemented secure voting technologies for election commissions on five continents in 25 countries. We've recorded and tabulated more than 5 billion votes with zero security breaches." ("About Smartmatic," [ HYPERLINK "<https://www.smartmatic.com/us/about/leadership/>" ], Accessed 11/13/20)

**Smartmatic Invests "Substantial Resources" Into Research And Development In Its Three Centers: The Americas, Europe, And Asia.** "Committed to innovation, Smartmatic invests substantial resources in its three R&D centers in the Americas, Europe and Asia." ("About Smartmatic," [ HYPERLINK "<https://www.smartmatic.com/us/about/leadership/>" ], Accessed 11/13/20)

### ***Company Leadership***

**Smartmatic Board Of Directors:**

[ PAGE \\* MERGEFORMAT ]

- **Roger Piñate, Director – Smartmatic Global Board** (“Our Team,” [ HYPERLINK "https://www.smartmatic.com/en/about/our-team/" ], Accessed 11/13/20)
- **Peter Neffenger, Chairman – Smartmatic USA Board** (“Our Team,” [ HYPERLINK "https://www.smartmatic.com/en/about/our-team/" ], Accessed 11/13/20)
- **Gracia Hillman, Director – Smartmatic USA Board** (“Our Team,” [ HYPERLINK "https://www.smartmatic.com/en/about/our-team/" ], Accessed 11/13/20)
- **David Melville, Director And Chief Counsel – Smartmatic Global Board** (“Our Team,” [ HYPERLINK "https://www.smartmatic.com/en/about/our-team/" ], Accessed 11/13/20)
- **Robert Cook, Executive Director – Smartmatic USA Board** (“Our Team,” [ HYPERLINK "https://www.smartmatic.com/en/about/our-team/" ], Accessed 11/13/20)
- **Paul DeGregorio, Director – Smartmatic USA Board** (“Our Team,” [ HYPERLINK "https://www.smartmatic.com/en/about/our-team/" ], Accessed 11/13/20)

#### **Global Management Team:**

- **Antonio Mugica, Chief Executive Officer** (“Our Team,” [ HYPERLINK "https://www.smartmatic.com/en/about/our-team/" ], Accessed 11/13/20)
- **Roger Piñate, President** (“Our Team,” [ HYPERLINK "https://www.smartmatic.com/en/about/our-team/" ], Accessed 11/13/20)
- **Pedro Mugica, President – Global Sales** (“Our Team,” [ HYPERLINK "https://www.smartmatic.com/en/about/our-team/" ], Accessed 11/13/20)

#### **U.S. Leadership Team:**

- **Denis Bechac, Business Development** (“Our Team,” [ HYPERLINK "https://www.smartmatic.com/us/about/leadership/" ], Accessed 11/13/20)
- **Samira Saba, Director – Communications** (“Our Team,” [ HYPERLINK "https://www.smartmatic.com/us/about/leadership/" ], Accessed 11/13/20)
- **Liliana Armas, General Counsel – Americas** (“Our Team,” [ HYPERLINK "https://www.smartmatic.com/us/about/leadership/" ], Accessed 11/13/20)
- **Edwin Smith, Director – Certification** (“Our Team,” [ HYPERLINK "https://www.smartmatic.com/us/about/leadership/" ], Accessed 11/13/20)
- **Shari Little, Product Management Director** (“Our Team,” [ HYPERLINK "https://www.smartmatic.com/us/about/leadership/" ], Accessed 11/13/20)
- **Jeff Scott, Business Product Manager** (“Our Team,” [ HYPERLINK "https://www.smartmatic.com/us/about/leadership/" ], Accessed 11/13/20)

#### **Los Angeles – VSAP Project – Management Team:**

- **James Long, VSAP Project Director** (“Our Team,” [ HYPERLINK "https://www.smartmatic.com/us/about/leadership/" ], Accessed 11/13/20)
- **Dan Murphy, VSAP Engagement Director** (“Our Team,” [ HYPERLINK "https://www.smartmatic.com/us/about/leadership/" ], Accessed 11/13/20)

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- **Angie McWhorter, VSAP Project Manager** ("Our Team," [ HYPERLINK "https://www.smartmatic.com/us/about/leadership/" ], Accessed 11/13/20)

### ***Smartmatic Is Privately Owned***

**Smartmatic Is Privately Owned By SGO, Employees, And Angel Investors.** "Two of the founders, Antonio Mugica and Roger Piñate, continue to run the company as CEO and President, respectively. The majority of shares (83%) are held by SGO, a company owned by the Mugica and Piñate families. The remaining shares are held by employees (10%) and angel investors (7%)." ("Smartmatic Fact-Checked," [ HYPERLINK "https://www.smartmatic.com/us/smartmatic-fact-checked/" ], Accessed 11/13/20)

**Smartmatic Does Not Own Any Other Voting Machine Company Currently.** "Does Smartmatic own any other voting machine company? No." ("Smartmatic Fact-Checked," [ HYPERLINK "https://www.smartmatic.com/us/smartmatic-fact-checked/" ], Accessed 11/13/20)

**Smartmatic's Software Is Not Licensed For Use In Other Company's Voting Machines.** "Is Smartmatic's software used in other company's voting machines? No. Smartmatic's software is not licensed or otherwise used by other companies." ("Smartmatic Fact-Checked," [ HYPERLINK "https://www.smartmatic.com/us/smartmatic-fact-checked/" ], Accessed 11/13/20)

### ***Smartmatic Has Transparency Problems***

**Smartmatic Is Not Transparent, As The Company Has Been "Restructured Into An Elaborate Web Of Offshore Companies And Foreign Trusts."** "But the role of the young Venezuelan engineers who founded Smartmatic has become less visible in public documents as the company has been restructured into an elaborate web of offshore companies and foreign trusts." (Tim Golden, "U.S. Investigates Voting Machines' Venezuela Ties," [ HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html" ], 10/29/06)

**Smartmatic Was Reorganized In An Array Of Holding Companies Based In Delaware, The Netherlands, And Curaçao, With The Firm's Ownership Further Shielded In Two Curaçao Trusts.** "More recent corporate documents show that before and after Smartmatic's purchase of Sequoia from a British-owned firm, the company was reorganized in an array of holding companies based in Delaware (Smartmatic International), the Netherlands (Smartmatic International Holding, B.V.), and Curaçao (Smartmatic International Group, N.V.). The firm's ownership was further shielded in two Curaçao trusts." (Tim Golden, "U.S. Investigates Voting Machines' Venezuela Ties," [ HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html" ], 10/29/06)

- **Smartmatic Claims The Reorganization Was Done To Expand The Company's International Operations, Not To Hide Its Ownership.** "Mr. Stoller, the Smartmatic spokesman, said that the reorganization was done simply to help expand the company's international operations, and that it had not tried to hide its ownership, which he said was more than 75 percent in the hands of Mr. Mugica and his family." (Tim Golden, "U.S. Investigates Voting Machines' Venezuela Ties," [ HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html" ], 10/29/06)

## **POLITICAL TIES & DONATIONS**

***Smartmatic Employees Have Made Nearly Than \$12,000 In Political Donations, But These Have Predominantly Gone To Democrats***

**Smartmatic Employees Have Donated A Total Of \$256.86 To Political Candidates Or Committees.** ([ HYPERLINK "https://www.fec.gov/data/receipts/individual-contributions/?contributor\_employer=smartmatic" ], Accessed 11/13/20)

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**Of That Amount, \$166.86 – Or 85 Percent – Went To Democratic Candidates Or Committees.** ([ HYPERLINK "[https://www.fec.gov/data/receipts/individual-contributions/?contributor\\_employer=smartmatic](https://www.fec.gov/data/receipts/individual-contributions/?contributor_employer=smartmatic)" ], Accessed 11/13/20)

- **Two Employees Donated A Total Of \$90.00 To President Trump.** ([ HYPERLINK "[https://www.fec.gov/data/receipts/individual-contributions/?contributor\\_employer=smartmatic](https://www.fec.gov/data/receipts/individual-contributions/?contributor_employer=smartmatic)" ], Accessed 11/13/20)

**Smartmatic General Counsel, Liliana Parnas, Has Donated \$11,515.86 To ActBlue, Earmarked For People Powered Action.** ([ HYPERLINK "[https://www.fec.gov/data/receipts/?data\\_type=processed&contributor\\_name=Liliana+Armas&two\\_year\\_transaction\\_period=2020&min\\_date=01%2F01%2F2019&max\\_date=12%2F31%2F2020&contributor\\_state=FL](https://www.fec.gov/data/receipts/?data_type=processed&contributor_name=Liliana+Armas&two_year_transaction_period=2020&min_date=01%2F01%2F2019&max_date=12%2F31%2F2020&contributor_state=FL)" ], Accessed, 11/13/20)

**Note:** Smartmatic Employees Are Prohibited From Making Political Donations. ("Smartmatic Fact-Checked," [ HYPERLINK "<https://www.smartmatic.com/us/smartmatic-fact-checked/>" ], Accessed 11/13/20)

## **DOMINION VOTING SYSTEMS AND SMARTMATIC'S SHORT-LIVED PARTNERSHIP**

### ***Dominion Voting Systems And Smartmatic Are Independent Companies That Offer Election Management Systems***

**Dominion Voting Systems Corporation Is A Company That Provides Election Planning And Voting Systems Such As Voter List Management, Voter List Strike-Off And Poll Tabulation.** "Dominion Voting Systems Corporation provides election planning processes and voting system services. The Company offers voter list management, voter list strike-off, and poll tabulation." ("Dominion Voting Systems Corp," [ HYPERLINK "<https://www.bloomberg.com/profile/company/3614901Z:CN>" ], Accessed 11/13/20)

- **Dominion Voting Systems, Inc. Is Registered In Colorado And Has An Office In Denver.** (Colorado Business Entity Search, [ HYPERLINK "<https://www.sos.state.co.us/biz/BusinessEntityDetail.do?quitButtonDestination=BusinessEntityResults&nameTyp=ENT&masterFileId=20101359683&entityId2=20101359683&fileId=20101359683&srchTyp=ENTITY>" ], Accessed 11/12/20; Dominion Voting Systems, Periodic Report, [ HYPERLINK "<https://www.sos.state.co.us/biz/ViewImage.do?masterFileId=20101359683&fileId=20201336566>" ], Filed 4/15/20; [ HYPERLINK "<https://www.dominionvoting.com/about/>" ], Accessed 11/12/20)

### **Smartmatic Corporation Is An Electoral Project Management And Consulting Company.**

"Smartmatic Corporation provides automated election systems. The Company offers electoral project management and consulting, voter education and information campaigns, consulting of electoral processes and documentation, including legal consulting. Smartmatic serves customers worldwide." ("Smartmatic Corp," [ HYPERLINK "<https://www.bloomberg.com/profile/company/576460Z:US>" ] \1":~:text=Smartmatic%20Corporation%20provides%20automated%20election,Smartmatic%20serves%20customers%20worldwide." ], Accessed 11/13/20)

### ***Dominion Voting Systems Does Not Own Smartmatic***

**Dominion Voting Systems Does Not Own Smartmatic.** "Neither Smartmatic or Mr. Soros has any ownership interest whatsoever in Dominion, and they have had no ownership interest in the past. Dominion has no relationship whatsoever with Mr. Soros, his companies or his foundations." ("Dominion Voting Systems Ownership: Fact Check," [ HYPERLINK "<https://www.co.hunterdon.nj.us/pdf/ElectionBd/2016-HunterdonCountyVotingMachineFactCheck.pdf>" ], 10/25/16)



**Snopes: Dominion Has No Company Ownership Relationships With Smartmatic.** "Dominion has no company ownership relationships with any member of the Pelosi family, the Feinstein family, or the Clinton Global Initiative, Smartmatic, or any ties to Venezuela. Dominion works with all political parties; our customer base and our government outreach practices reflect this nonpartisan approach." (Dan Evon "Rumor Alert: Dominion Voting Systems Fraud Claims," [ HYPERLINK "https://www.snopes.com/fact-check/rumor-alert-dominion-voting-systems-fraud-claims/" ], 11/8/20)

***In 2009, Dominion Entered Into A Contract Providing Optical Scanners To Smartmatic***

**In 2009, Dominion Entered Into A Contract With Smartmatic In Which They Provided Smartmatic Optical Scanners To Be Used In The 2010 Philippine Election.** "Dominion entered into a 2009 contract with Smartmatic and provided Smartmatic with the PCOS machines (optical scanners) that were used in the 2010 Philippine election, the biggest automated election run by a private company. The automation of that first election in the Philippines was hailed by the international community and by the critics of the automation. The results transmission reached 90% of votes four hours after polls closed and Filipinos knew for the first time who would be their new president on Election Day. In keeping with local Election law requirements, Smartmatic and Dominion were required to provide the source code of the voting machines prior to elections so that it could be independently verified." ("Voting Technology Companies in the U.S. - Their Histories and Present Contributions," [ HYPERLINK "https://www.accesswire.com/471912/Voting-Technology-Companies-in-the-US--Their-Histories-and-Present-Contributions" ], 8/10/17)

**Smartmatic's Reputation Suffered After Glitches In The Philippine Elections**

**Dominion And Smartmatic's Reputations Suffered After A Series Of High Profile Glitches In The 2010 And 2013 Philippine Elections.** "Both companies' reputations suffered as a result of heavily publicized litigation relating to a software glitch that was resolved just before the 2010 election and that litigation rumbled on to partly affect the mid-term elections in 2013. However, for the 2016 elections in the Philippines, Smartmatic operated with their own technology having released a new vote counting machine which replaced the previous version, resulting in 'the speediest canvassing proceedings in the country's history.'" ("Voting Technology Companies in the U.S. - Their Histories and Present Contributions," [ HYPERLINK "https://www.accesswire.com/471912/Voting-Technology-Companies-in-the-US--Their-Histories-and-Present-Contributions" ], 8/10/17)

**Litigation Over Smartmatic "Glitches" Has Alleged An Impact On The 2010 And 2013 Mid-Term Elections In The Philippines.** "Litigation over Smartmatic 'glitches' alleges they impacted the 2010 and 2013 mid-term elections in the Philippines, raising questions of cheating and fraud. An independent review of the source codes used in the machines found multiple problems, which concluded, 'The software inventory provided by Smartmatic is inadequate, ... which brings into question the software credibility,' ABS-CBN reported." (Bethany Blankley, "Officials Raised Concerns For Years About Security Of US Voting Machines, Software Systems," [ HYPERLINK "https://www.washingtonexaminer.com/politics/officials-raised-concerns-for-years-about-security-of-us-voting-machines-software-systems" ], 11/9/20)

**Note: Smartmatic's Chairman Is Loosely Affiliated With George Soros**

**Smartmatic's Chairman, Mark Malloch Brown, Is A Member Of The British House Of Lords And Was A Former Vice-Chairman Of George Soros' Investment Funds.** "Smartmatic's chairman is a member of the British House of Lords, Mark Malloch Brown, a former vice-chairman of George Soros' Investment Funds, former vice-president at the World Bank, lead international partner at Sawyer Miller, a political consulting firm, and former vice-chair of the World Economic Forum who "remains deeply involved in international affairs." The company's reported globalist ties have caused members of the media and government officials to raise questions about its involvement in the U.S. electoral process."

(Bethany Blankley, "Officials Raised Concerns For Years About Security Of US Voting Machines, Software Systems," [ HYPERLINK

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"<https://www.washingtonexaminer.com/politics/officials-raised-concerns-for-years-about-security-of-us-voting-machines-software-systems>" ], 11/9/20)

### ***Dominion And Smartmatic Terminated Their Contract In 2012 Over A Disagreement Regarding A Noncompetition Agreement In Puerto Rico***

**In 2012, Dominion Accused Smartmatic Of Breaching A Noncompetition Clause By Conducting Business In Puerto Rico – Smartmatic Claimed That Puerto Rico Was Not Part Of The United States And Therefore Was Not In Violation Of An Agreement Not To Compete In The United States.** “In 2012, Smartmatic submitted a bid to sell the licensed voting systems to the government of Puerto Rico for its upcoming elections. Dominion also submitted a bid. Upon learning of Smartmatic’s bid, Dominion notified Smartmatic by letter that Smartmatic was in breach of the license agreement’s noncompetition provision, asserting that Puerto Rico is ‘in the United States.’ Dominion also purported to terminate the agreement as a result of the alleged breach. Smartmatic rejected Dominion’s termination as invalid, contending that Puerto Rico is not ‘in the United States.’ Following its purported termination of the license agreement, Dominion ceased performing its contractual obligations, leading Smartmatic to file suit in the Court of Chancery. In response, Dominion asserted counterclaims.” (“Smartmatic Int’l Corp. v. Dominion Voting Sys. Int’l Corp., C.A. No. 7844-VCP (Del. Ch. May 1, 2013) (Parsons, V.C.),” [ [HYPERLINK "https://www.potteranderson.com/delawarecase-77.html"](https://www.potteranderson.com/delawarecase-77.html) ], 5/1/13)

### ***There Is No Evidence That Dominion Used Smartmatic’s Software In The 2020 Election Cycle***

**The Partnership Between Dominion And Smartmatic Ended In 2012 “On Rocky Terms.”** “As previously mentioned, Smartmatic and Dominion Voting have shared tumultuous interactions. Their 2009 partnership ended on rocky terms. The termination of their agreement in 2012 had the potential to deny Smartmatic access to vital material and information necessary to correct any issues with the PCOS voting devices, which created an understandable fear among the Filipino public since Smartmatic had been contracted to provide the PCOS systems for the May 2013 mid-term elections. However, for the mid-term 2013 elections, Smartmatic deployed 76,000 machines and only 258 of those had to be replaced, and in many cases, it was due to handling errors rather than machine failures.” (“Voting Technology Companies in the U.S. - Their Histories and Present Contributions,” [ [HYPERLINK "https://www.accesswire.com/471912/Voting-Technology-Companies-in-the-US--Their-Histories-and-Present-Contributions"](https://www.accesswire.com/471912/Voting-Technology-Companies-in-the-US--Their-Histories-and-Present-Contributions) ], 8/10/17)

## **THERE IS NO APPARENT RELATIONSHIP BETWEEN SMARTMATIC AND INDRA**

### ***Smartmatic And Indra Do Not Appear To Have Ties***

**Smartmatic Claims To Not Have Any Ties To Indra Sistemas According To Its Website.** “Does Smartmatic have any ties to Indra Sistemas? No.” (“Smartmatic Fact-Checked,” [ [HYPERLINK "https://www.smartmatic.com/us/smartmatic-fact-checked/"](https://www.smartmatic.com/us/smartmatic-fact-checked/) ], Accessed 11/13/20)

### ***Smartmatic And Indra Are Rivals***

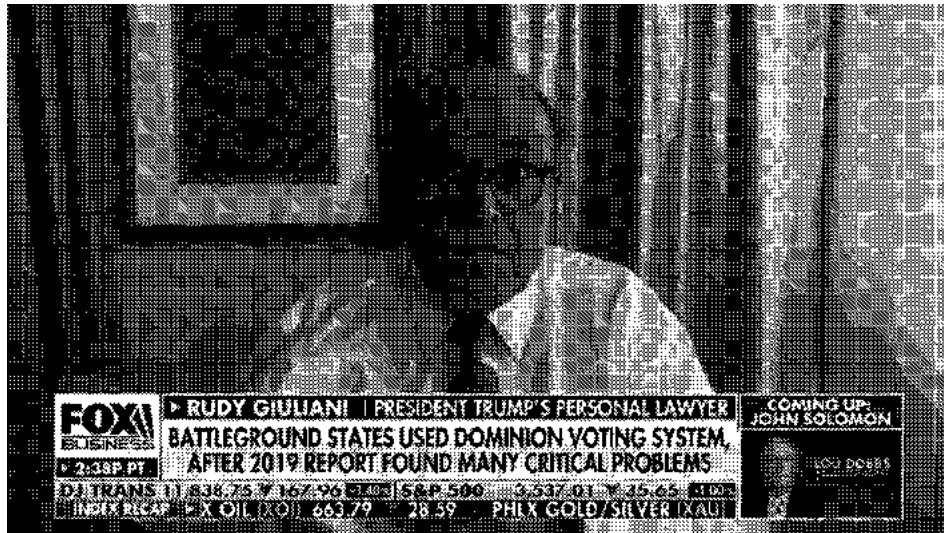
**Smartmatic And Indra Were Considered Rival Companies In The Philippines.** “It looks like the war between two technology providers vying for a P2.5-billion contract at the Commission on Elections (Comelec) for the 2016 presidential polls has begun. Smartmatic-TIM Corp., which provided the technology during the last two elections in the country, has questioned the eligibility of rival Indra Sistemas S.A. to participate in the public bidding for the lease of 23,000 optical mark reader (OMR) machines for the forthcoming balloting. In a statement, Smartmatic-TIM lead counsel Ruby Yusi said the approval of Indra’s eligibility in the first stage of the bidding process was questionable since the Spanish company failed to properly designate a local representative for the bidding.” (“It’s War Between 2 Tech Firms For

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Comelec Contract," [ HYPERLINK "https://business.inquirer.net/184165/its-war-between-2-tech-firms-for-comelec-contract" ] 12/29/14)

### ***Rudy Giuliani Claimed That Smartmatic Sent Its Votes Overseas To Barcelona To Be Counted***

**On November 12, Rudy Giuliani Claimed On Fox Business That Votes From The Dominion Machines Sent The Votes To Be Counted In Barcelona, Spain.** RUDY GIULIANI: "Dominion is a Canadian company but all of its software is Smartmatic Software. The votes actually go to Barcelona, Spain." (Fox Business' "Lou Dobbs Tonight," 11/12/20)



[ HYPERLINK  
"https://www.youtube.com/watch?v=evpejvWAh9w&feature=youtu.be&t=156&ab\_channel=FrontPageIndex" ]

### ***However, The Only Apparent Evidence That Votes Were Being Counted In Spain Was That Smartmatic Is Owned By A Spanish Person***

**Antonio Mugica Is The CEO And Co-Founder Of Smartmatic Corp.** ("Antonio Mugica," [ HYPERLINK "https://www.bloomberg.com/profile/person/15135990" ], Accessed 11/13/20)

**Mugica Is A Spanish-Venezuelan Dual National.** "The firm said it is owned primarily by three entrepreneurs: Antonio Mugica, a dual-Spanish-Venezuelan national." ("Voting Machine Company Vows No Connection to Venezuelan President Chavez," [ HYPERLINK "https://www.govtech.com/security/Voting-Machine-Company-Vows-No-Connection.html" ], 1/1/06)

**Mugica Lives In London, United Kingdom.** (Antonio Mugica, [ HYPERLINK "https://www.linkedin.com/in/antoniomugica/?originalSubdomain=uk" ], Accessed 11/13/20)

**Smartmatic Is Headquartered In London, United Kingdom.** ("Get in touch with us," [ HYPERLINK "https://www.smartmatic.com/us/contact/" ], Accessed 11/13/20)

## **VENEZUELA**

### ***Dominion Has No Company Ties To Venezuela***

**Snopes: Dominion Has No Company Ties To Venezuela.** "Dominion has no company ownership relationships with any member of the Pelosi family, the Feinstein family, or the Clinton Global Initiative, Smartmatic, or any ties to Venezuela. Dominion works with all political parties; our customer base and

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our government outreach practices reflect this nonpartisan approach.” (Dan Evon “Rumor Alert: Dominion Voting Systems Fraud Claims,” [ [HYPERLINK "https://www.snopes.com/fact-check/rumor-alert-dominion-voting-systems-fraud-claims/"](https://www.snopes.com/fact-check/rumor-alert-dominion-voting-systems-fraud-claims/) ], 11/8/20)

### ***Smartmatic’s Ties To Venezuela***

**Smartmatic’s Business Address Was Originally Registered To The Father Of One Of The Two Young Venezuelan Engineers Who Were Its Principal Officers, Antonio Mugica And Alfredo Anzola.**

“Smartmatic was then a fledgling technology start-up. Its registered address was the Boca Raton, Fla., home of the father of one of the two young Venezuelan engineers who were its principal officers, Antonio Mugica and Alfredo Anzola, and it had a one-room office with a single secretary.” (Tim Golden, “U.S. Investigates

Voting Machines’ Venezuela Ties,” [ [HYPERLINK](https://www.nytimes.com/2006/10/29/washington/29ballot.html)

"https://www.nytimes.com/2006/10/29/washington/29ballot.html" ], 10/29/06)

**The Concerns About Possible Ties Between The Owners Of Smartmatic And The Chávez**

**Government Have Been Well Known To U.S. Foreign Policy Officials Since 2004.** “The concerns about possible ties between the owners of Smartmatic and the Chávez government have been well known to United States foreign-policy officials since before the 2004 recall election in which Mr. Chávez, a strong ally of President Fidel Castro of Cuba, won by an official margin of nearly 20 percent.” (Tim Golden, “U.S.

Investigates Voting Machines’ Venezuela Ties,” [ [HYPERLINK](https://www.nytimes.com/2006/10/29/washington/29ballot.html)

"https://www.nytimes.com/2006/10/29/washington/29ballot.html" ], 10/29/06)

**In 2006, The Committee On Foreign Investment In The United States Opened An Investigation Into Smartmatic.**

“The federal government is investigating the takeover last year of a leading American manufacturer of electronic voting systems by a small software company that has been linked to the leftist Venezuelan government of President Hugo Chávez. The inquiry is focusing on the Venezuelan owners of the software company, the Smartmatic Corporation, and is trying to determine whether the government in Caracas has any control or influence over the firm’s operations, government officials and others familiar with the investigation said. The inquiry on the eve of the midterm elections is being conducted by the Committee on Foreign Investment in the United States, or Cfius, the same panel of 12 government agencies that reviewed the abortive attempt by a company in Dubai to take over operations at six American ports earlier this year.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [ [HYPERLINK](https://www.nytimes.com/2006/10/29/washington/29ballot.html)

"https://www.nytimes.com/2006/10/29/washington/29ballot.html" ], 10/29/06)

### **The Venezuelan Government Invested Heavily In Smartmatic’s Owners**

**In 2004, Smartmatic Was Chosen By Venezuelan Authorities To Be Used In A Contentious**

**Referendum That Confirmed Hugo Chávez As President.** “Smartmatic was a little-known firm with no experience in voting technology before it was chosen by the Venezuelan authorities to replace the country’s elections machinery ahead of a contentious referendum that confirmed Mr. Chávez as president in August 2004.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [ [HYPERLINK](https://www.nytimes.com/2006/10/29/washington/29ballot.html)

"https://www.nytimes.com/2006/10/29/washington/29ballot.html" ], 10/29/06)

- **This Election Involved “A Very Subtle Algorithm” That Appeared To Adjust The Vote In Chávez’s Favor.** “Turning to Venezuela, he said that Chavez controlled all of the country’s voting equipment before he won a 2004 nationwide recall vote that had threatened to end his rule. When Chavez won, Venezuelan mathematicians challenged results that showed him to be consistently strong in parts of the country where he had weak support. The mathematicians found ‘a very subtle algorithm’ that appeared to adjust the vote in Chavez’s favor, Stigall said.” (Greg Gordon, “Most Electronic Voting Isn’t Secure, CIA Expert Says,” [ [HYPERLINK "https://www.mcclatchydc.com/news/politics-government/article24530650.html"](https://www.mcclatchydc.com/news/politics-government/article24530650.html) ] , 3/24/09)

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**Months Before This Contract Was Awarded To Smartmatic, A Venezuelan Government Financing Agency Invested Over \$200,000 Into A Technology Company Owned By Some Of The Same People As Smartmatic, That Joined With Smartmatic As A Minor Partner In The Bid.** “Seven months before that voting contract was awarded, a Venezuelan government financing agency invested more than \$200,000 into a smaller technology company, owned by some of the same people as Smartmatic, that joined with Smartmatic as a minor partner in the bid.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [ [HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html) ], 10/29/06)

- **This Smaller Company Was Called The Bizta Corporation.** “Opposition members of Venezuela’s electoral council had also protested that they were excluded from the bidding process in which Smartmatic and a smaller company, the Bizta Corporation, were selected to replace a \$120 million system that had been built by Election Systems and Software of Omaha.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [ [HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html) ], 10/29/06)

**In Return, The Venezuelan Government Agency Was Given A 28 Percent Stake In The Smaller Company And A Seat On Its Board.** “In return, the government agency was given a 28 percent stake in the smaller company and a seat on its board, which was occupied by a senior government official who had previously advised Mr. Chávez on elections technology. But Venezuelan officials later insisted that the money was merely a small-business loan and that it was repaid before the referendum.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [ [HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html) ], 10/29/06)

- **The Venezuelan Government Placed A Senior Official Of The Science Ministry, Omar Montilla, On Bizta’s Board.** “Weeks before Bizta and Smartmatic won the referendum contract, the government also placed a senior official of the Science Ministry, Omar Montilla, on Bizta’s board, alongside Mr. Mugica and Mr. Anzola.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [ [HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html) ], 10/29/06)
- **Montilla Acted As An Adviser To Chávez On Elections Technology.** “Mr. Montilla, The Herald reported, had acted as an adviser to Mr. Chávez on elections technology.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [ [HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html) ], 10/29/06)

**In 2006, A Smartmatic Spokesperson Denied That Venezuela Has Ever Held Any Stake In Smartmatic, But Acknowledged The Role The Venezuelan Government Played In The “Separate Company” Bizta.** “‘No foreign government or entity, including Venezuela, has ever held any stake in Smartmatic,’ Mr. Stoller said. ‘Smartmatic has always been a privately held company, and despite that, we’ve been fully transparent about the ownership of the corporation.’ Mr. Stoller emphasized that Bizta was a separate company and said the shares the Venezuelan government received in it were ‘the guarantee for a loan.’” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [ [HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html) ], 10/29/06)

**Venezuelan Officials Insisted The Money Invested In Bizta Was “Merely A Small-Business Loan And That It Was Repaid Before The Referendum.”** “But Venezuelan officials later insisted that the money was merely a small-business loan and that it was repaid before the referendum.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [ [HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html) ], 10/29/06)

## SMARTMATIC OWNED SEQUOIA BETWEEN 2005 AND 2007

### *In 2005, Smartmatic Bought Sequoia Voting Systems*

**In 2005, Smartmatic Bought Sequoia Voting Systems With A Windfall Of \$120 Million From Its Contracts With Venezuela.** "With a windfall of some \$120 million from its first three contracts with Venezuela, Smartmatic then bought the much larger and more established Sequoia Voting Systems, which now has voting equipment installed in 17 states and the District of Columbia." (Tim Golden, "U.S. Investigates Voting Machines' Venezuela Ties," [ HYPERLINK "<https://www.nytimes.com/2006/10/29/washington/29ballot.html>" ], 10/29/06)

### *While Smartmatic Owned Sequoia, Sequoia Voting Machines Caused Irregularities In Chicago*

**In March 2006, A Series Of Delays And Irregularities In Chicago Were Blamed On Sequoia Voting Machines, Traceable To Smartmatic Workers And Software Issues From Venezuela.** "But after a municipal primary election in Chicago in March, Sequoia voting machines were blamed for a series of delays and irregularities. Smartmatic's new president, Jack A. Blaine, acknowledged in a public hearing that Smartmatic workers had been flown up from Venezuela to help with the vote. Some problems with the election were later blamed on a software component, which transmits the voting results to a central computer, that was developed in Venezuela." (Tim Golden, "U.S. Investigates Voting Machines' Venezuela Ties," [ HYPERLINK "<https://www.nytimes.com/2006/10/29/washington/29ballot.html>" ], 10/29/06)

### *In 2007, Smartmatic Sold Sequoia Voting Machines*

**In 2007, Smartmatic Was Forced To Sell Sequoia Voting Systems.** "On December 22, 2006, Smartmatic Corporation announced the company's intention to sell Sequoia Voting Systems. At that time, Smartmatic CEO Antonio Mugica stated, 'Sequoia's customer base has grown substantially and its revenues have increased four-fold. However, given the current climate of the United States marketplace with so much public debate over foreign ownership of firms in an area that is viewed as critical U.S. infrastructure - election technology - we feel it is in both companies' best interests to move forward as separate entities with separate ownership. As part of this process, we plan to sell our Sequoia Voting Systems ownership.' Sequoia Voting Systems worked for many months with Smartmatic to find an appropriate situation that would be a win-win for both companies. Given Sequoia's strong position in the US electoral market and significant opportunities therein, many buyers expressed interest in Sequoia. Smartmatic selected this team to purchase Sequoia as they believe in the ability of Sequoia's current management team to perform as successfully as they have in the past, which will allow Smartmatic to capitalize on the earn-out purchase plan." (Press Release, "U.S. Voting Technology Leader Sequoia Voting Systems Announces New Corporate Ownership," [ HYPERLINK "<http://web.archive.org/web/20071226071517/http://www.sequoiavote.com/pressText.php?pressIn=41>" ], 11/8/07)

- **Jack Blaine And Peter McManemy Led The Purchase Of Sequoia From Smartmatic, Making The Company U.S. Owned.** "The investment group, led by Sequoia President & CEO Jack Blaine and company Chief Financial Officer Peter McManemy, purchased Sequoia from former parent company Smartmatic Corporation for an undisclosed sum. As with most transactions involving two private entities, the specific terms of the sale are not being disclosed. However, this transaction does include investment by the management team, a small loan and an earn-out. This scenario provides an excellent financial structure for Sequoia to leverage and completely eliminates Smartmatic's ownership, control and operational rights of any kind in Sequoia." (Press Release, "U.S. Voting Technology Leader Sequoia Voting Systems Announces New Corporate Ownership," [ HYPERLINK

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"http://web.archive.org/web/20071226071517/http://www.sequoiavote.com/pressText.php?pressIn=41" ], 11/8/07)

**In 2008, It Was Revealed Smartmatic's Intellectual Property Still Existed In Sequoia's Machines.**

"In return, Smartmatic promises to grant to Hart a license to use its intellectual property currently found in Sequoia's machines." (Civil Action No. 3585-VCL, [ HYPERLINK

"https://courts.delaware.gov/opinions/(q12dhpay5yxgbz55qzb5h0nb)/download.aspx?ID=105040" ], 3/31/08)

***Sequoia Was Acquired By Dominion In 2020***

**In 2010, Sequoia Was Acquired By Dominion Voting Systems.** "After losing money for several years, on March 8, 2005, Sequoia was acquired by Smartmatic, a multi-national technology company which had developed advanced election systems, voting machines included. In November 2007, following a verdict by the CFIUS, Smartmatic was ordered to sell Sequoia, which it did to its Sequoia managers having U.S. citizenship. Sequoia Voting Systems was acquired by Denver-based Dominion Voting Systems on June 4, 2010." ("Manufacturer Profile," [ HYPERLINK "https://verifiedvoting.org/election-system/sequoia-dominion-optech-insight/" ], Accessed 11/13/20)

**DOMINION'S LEADERSHIP HAS NO TIES TO ANTIFA**

***There Is No Evidence To The Claim That Dominion's Head Of Strategy And Security Has Ties To Antifa***

**Note:** *Similarly, there is no evidence that Dominion's CEO John Poulos has ties to antifa*

**There Is An Internet Rumor That A Top Level Employee At Dominion Has Ties To Antifa**

**Eric Coomer Is An Executive With Dominion Voting Systems.** "Eric Coomer, an executive with Dominion Voting Systems, which sold the state its new election system last year for more than \$100 million, said the problem has to do with the way the voting machines communicate with the underlying Android operating system. He told Totenberg a minor software change will address the issue." (Kate Brumback, "Lawyers Spar Over Georgia Voting Machine Glitch, Planned fix," [ HYPERLINK "https://apnews.com/article/election-2020-senate-elections-technology-georgia-elections-af357b7ab7145033f11ee34a1bbf4a3c" ], 9/29/20)

- **Coomer Was The Director Of Product Strategy For Dominion.** ("Risk-Limiting Audit, Participation Group: Kickoff Conference: Colorado Secretary of State," [ HYPERLINK "https://www.sos.state.co.us/pubs/elections/VotingSystems/riskAuditFiles/20170203RLAParticipantGroup.pdf" \l "page=7" ], 2/3/17)

**The Rumors Are Fueled Because Of Now-Deleted Anti-Police Facebook Posts**

**A Blogger Under The Pseudonym "Conservative Treehouse" Alleged That Dr. Eric Coomer, Who He Claimed Was The Head Of Strategy And Security For Dominion Voting Systems, Was A Supporter Of Antifa For Now-Deleted Facebook Posts In Which Coomer Allegedly Posted Anti-Police Songs.**

"These are posts that Dr. Eric Coomer posted in May. He is the man that is responsible for the Strategy and Security of Dominion Voting Systems. Notice the anti-American sentiment. Eric Coomer is a major shareholder in Dominion Voting Systems, holder of election system patents and an Antifa supporter."

(Conservative Treehouse, [ HYPERLINK

"https://www.facebook.com/ConservativeTreehouse/posts/3452364778132202" ], 11/12/20)

**Note:** *There are other similar posts directed at Dr. Eric Coomer*

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These are posts that Dr. Eric Coomer posted in May. He is the man that is responsible for the Strategy and Security of Dominion Voting Systems. Notice the anti-American sentiment. Eric Coomer is a major shareholder in Dominion Voting Systems, holder of election system patents and an Antifa supporter.



**However, There Is No Evidence That Eric Coomer Is A Supporter Of Antifa In Any Way**

**In June, Eric Coomer Posted A Facebook Message In Which He Attacked President Trump's Characterization Of Antifa As An Organization But Did Not Endorse Or Indicate Membership In The Group.** (Stephen Oatley, "BREAKING: Does a former Dominion Voter Systems VP and current patent holder have ties to the terrorist group (or idea) known as Antifa?" [ [HYPERLINK "https://www.ptnewsnetwork.com/breaking-does-a-former-dominion-voter-systems-vp-and-current-patent-holder-have-ties-to-the-terrorist-group-or-idea-known-as-antifa/"](https://www.ptnewsnetwork.com/breaking-does-a-former-dominion-voter-systems-vp-and-current-patent-holder-have-ties-to-the-terrorist-group-or-idea-known-as-antifa/) ], 11/13/20)



Eric Coomer

June 2 · 🌐

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In case you didn't know:

"Antifa" has made a statement:

TO: ALL MEDIA

PUBLIC STATEMENT FROM: "ANTIFA" IN RESPONSE TO THE THREATS  
ISSUED BY UNITED STATES PRESIDENT DONALD J. TRUMP

Dear Mr. Trump:

Let us be perfectly clear:

"Antifa" isn't an organization. There's no membership, no meetings, no dues, no rules, no leaders, no structure. It is, literally, an idea and nothing more. Even the claim of this author to represent "Antifa" is one made unilaterally for the purposes of this communication and nothing more; there is no governing body nor trademark owner to dispute the author's right to represent "AntiFa."

"Antifa" is a neologism constructed from a contraction of the phrase "anti-fascist." The truth is, there's no such thing as being "anti-Fascist." Either you are a decent human being with a conscience, or you are a fascist.

The ostensible president of the United States has, today, openly declared that he is a fascist, and that he intends to turn the military power of the United States into a fascist tool.

Now there is no question, and we can stop pretending that this man represents anything but the worst in humanity, which his supporters embody.

And that is the only effect his words will have.

It will likely be no problem for LEO to identify the author of this document, who also has maintained the "AntiFa" page on Facebook since founding it in 2017.

The author of this document is unconcerned with that inevitability because neither that author, nor this document, has been involved in a crime of any sort in any way.

But, since both the "president" and the media insist on acting as though "AntiFa" is this big, scary organization, the author supposes it's time for "AntiFa" to make a statement.

Thus:

"AntiFa supports and defends the right of all people to live free from

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